



SACHI A. HAMAI  
Interim Chief Executive Officer

County of Los Angeles  
**CHIEF EXECUTIVE OFFICE**  
Kenneth Hahn Hall of Administration  
500 West Temple Street, Room 713, Los Angeles, California 90012  
(213) 974-1101  
<http://ceo.lacounty.gov>

*"To Enrich Lives Through Effective And Caring Service"*

Board of Supervisors  
HILDA L. SOLIS  
First District

MARK RIDLEY-THOMAS  
Second District

SHEILA KUEHL  
Third District

DON KNABE  
Fourth District

MICHAEL D. ANTONOVICH  
Fifth District

September 01, 2015


**ADOPTED**

BOARD OF SUPERVISORS  
COUNTY OF LOS ANGELES

26 September 1, 2015

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors:

  
PATRICK OGAWA  
ACTING EXECUTIVE OFFICER

**RESPONSES TO THE 2014-15 CIVIL GRAND JURY FINAL REPORT RECOMMENDATIONS  
(ALL AFFECTED)  
(3 VOTES)**

**SUBJECT**

Approval of County's responses to the findings and recommendations of the 2014-15 Civil Grand Jury Final Report, and the transmittal of responses to the Civil Grand Jury, as well as the Superior Court, upon approval by the Board.

**IT IS RECOMMENDED THAT THE BOARD:**

1. Approve the responses to the findings and recommendations of the 2014-15 Civil Grand Jury Final Report that pertain to County government matters under the control of the Board.
2. Instruct the Acting Executive Officer of the Board of Supervisors to transmit copies of this report to the Civil Grand Jury, upon approval by the Board.
3. Instruct the Acting Executive Officer of the Board of Supervisors to file a copy of this report with the Superior Court, upon approval by the Board.

**PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION**

Section 933 (b) of the California Penal Code establishes that the county boards of supervisors shall comment on grand jury findings and recommendations which pertain to county government matters under control of those boards.

On July 1, 2015, the 2014-2015 County of Los Angeles Civil Grand Jury released its Final Report containing findings and recommendations directed to various County and non-County agencies. County department heads have reported back on the Civil Grand Jury recommendations and these responses are attached as the County's official response to the 2014-2015 Civil Grand Jury Final Report.

Recommendations that make reference to non-County agencies have been referred directly by the Civil Grand Jury to those entities.

### **Implementation of Strategic Plan Goals**

The recommendations and responses are consistent with all three of the County Strategic Plan Goals:

Goal No. 1 - Operational Effectiveness/Fiscal Sustainability: Maximize the effectiveness of the County's processes, structure, operations, and strong fiscal management to support timely delivery of customer-oriented and efficient public services.

Goal No. 2 – Community Support and Responsiveness: Enrich lives of Los Angeles County residents by providing enhanced services, and effectively planning and responding to economic, social, and environmental challenges.

Goal No. 3 – Integrated Services Delivery: Maximize opportunities to measurably improve client and community outcomes and leverage resources through the continuous integration of health, community, and public safety services.

### **FISCAL IMPACT/FINANCING**

Certain Civil Grand Jury recommendations require additional financing resources. In some cases, financing has been approved by the Board in the current fiscal year budget. Departments will assess the need for additional funding during the 2015-16 budget cycle and beyond, as appropriate.

### **FACTS AND PROVISIONS/LEGAL REQUIREMENTS**

In accordance with California Penal Code Section 933 (b), the following departments have submitted responses to the 2014-15 County of Los Angeles Civil Grand Jury Final Report.

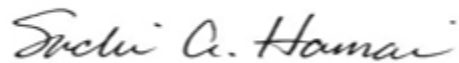
ATTACHMENT	DEPARTMENT
A	Chief Executive Office
B	Chief Information Office
C	Community Development Commission
D	Executive Office of the Board
E	Internal Services
F	Probation
G	Sheriff

Attachment H is a matrix of departmental responses to recommendations of the 2014-15 County of Los Angeles Civil Grand Jury Final Report.

**IMPACT ON CURRENT SERVICES (OR PROJECTS)**

Not applicable.

Respectfully submitted,

A handwritten signature in cursive script, reading "Sachin A. Hamai".

SACHI A. HAMAI

Interim Chief Executive Officer

SAH:JJ:SK

JR:cc

Enclosures

c: Executive Office, Board of Supervisors  
County Counsel  
Sheriff  
Chief Information Office  
Community Development Commission  
Internal Services  
Probation

# **Attachment A**

## **Chief Executive Office**



SACHI A. HAMAI  
Interim Chief Executive Officer

## County of Los Angeles CHIEF EXECUTIVE OFFICE

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Board of Supervisors  
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Third District

DON KNABE  
Fourth District

MICHAEL D. ANTONOVICH  
Fifth District

August 19, 2015

To: Mayor Michael D. Antonovich  
Supervisor Hilda L. Solis  
Supervisor Mark Ridley-Thomas  
Supervisor Sheila Kuehl  
Supervisor Don Knabe

From: Sachi A. Hamai   
Interim Chief Executive Officer

### 2014-2015 CIVIL GRAND JURY FINAL REPORT

Attached are this Office's responses to the 2014-2015 Civil Grand Jury Final Report. We are responding to specific recommendations dealing with the following sections:

- Affordable Housing
- Automated External Defibrillator
- County Information Systems
- Oversight of the Sheriff and Powers for the Office of Inspector General
- Sybil Brand Commission

If you have any questions regarding our responses, please contact me, or your staff may contact Jerry Ramirez of this Office at (213) 974-4282, or [jramirez@ceo.lacounty.gov](mailto:jramirez@ceo.lacounty.gov)

SAH:JJ:SK  
JR:ib

Attachment

*"To Enrich Lives Through Effective And Caring Service"*

***Please Conserve Paper – This Document and Copies are Two-Sided  
Intra-County Correspondence Sent Electronically Only***

**RESPONSE TO THE GRAND JURY FINAL REPORT**

COUNTY OF LOS ANGELES – Chief Executive Office (Community and Municipal Services)

SUBJECT: 2014-2015 GRAND JURY RECOMMENDATIONS FOR  
AFFORDABLE HOUSING

RECOMMENDATION NO. 1.7

The Los Angeles County Board of Supervisors should review current funding levels to the Community Development Commission for affordable housing development to ensure that the levels are sufficient to reach county goals in light of the Affordable Housing and Economic Development Framework and Implementation Strategy.

RESPONSE

The recommendation requires further analysis.

The Board of Supervisors, in consultation with the CDC and CEO, will continue its review of funding allocated to the CDC for affordable housing. This will include an analysis of the Affordable Housing Development Framework, 2015 Update when it is available this fall. In light of the demonstrated need for affordable housing in the County, the Board seeks to maximize funding levels to meet County goals.

RECOMMENDATION NO. 1.8

The Board of Supervisors should amend its 2013 motion and allow the Community Development Commission to release the county General Funds more expediently.

RESPONSE

The recommendation requires further analysis.

As noted in our response to Recommendation 1.7, above, the Board of Supervisors, in consultation with the CDC and CEO, will review the 2015 Framework which will inform a decision about whether an accelerated release of previously committed General Funds for affordable housing funds is warranted. A key consideration will be the availability of sufficient funding for affordable housing development in subsequent years.

RECOMMENDATION NO. 1.9

The Board of Supervisors should consider permanent funding sources for affordable housing development, including a housing impact fee.

## RESPONSE

The recommendation requires further analysis.

The Board of Supervisors will continue to consider permanent funding sources for affordable housing development, including the feasibility of impact fees as a source for affordable housing development. Jurisdictions in the County have a variety of “impact” or development related fees. Research indicates impact fees, include “capacity fees,” “facility fees,” “infrastructure fees,” “system development charges” and “capital recovery fees.”

The common characteristics of such fees include: 1) charging only to new development; 2) standardized fees as opposed to ad hoc, negotiated payments; and 3) design and use to fund capital improvements and public services, such as schools, parks, libraries, fire and police services, roads and utilities needed to serve growth. Developers must pay these fees and meet the jurisdiction’s planning and zoning requirements before their projects are granted approval.

COUNTY OF LOS ANGELES – Chief Executive Office (Risk Management)

SUBJECT: 2014-2015 GRAND JURY RECOMMENDATIONS FOR  
AUTOMATED EXTERNAL DEFIBRILLATOR

RECOMMENDATION NO. 2.1

The implementation of a Public Access Defibrillator (PAD) program should remain discretionary within Los Angeles County. The Board of Supervisors should continue to allow each department to retain the choice of implementing or not implementing this program.

RESPONSE

The County agrees with the Civil Grand Jury's recommendation to allow for departmental discretionary implementation of Automated External Defibrillators.

RECOMMENDATION NO. 2.2

The Board of Supervisors should implement education and training programs on the device before further investment

RESPONSE

Departments that elect to implement Automated External Defibrillators obtain specific education and training as it pertains to the circumstances of the department. The County agrees with the Civil Grand Jury's recommendation that an expanded education and training program would need to be developed before further investment.



COUNTY OF LOS ANGELES – Chief Executive Office (Operations)

SUBJECT: 2014-2015 GRAND JURY RECOMMENDATIONS FOR  
COUNTY INFORMATION SYSTEMS

RECOMMENDATION NO. 4.8

The Los Angeles County Board of Supervisors should provide ITS and the other county data centers with secure facilities.

RESPONSE

Agree. This recommendation has not yet been implemented. At the Board's direction, the Chief Information Officer has completed a County Data Center Assessment and Consolidation Strategy. The results of this work is currently used by the Chief Executive Office to evaluate the "build, buy, lease" options for a consolidated County Data Center. The report from the Chief Executive Office is scheduled to be completed in August 2015.

RECOMMENDATION NO. 4.9

The Los Angeles County Board of Supervisors should promote production hosting by Information Technology Service.

RESPONSE

Agree. This recommendation has not yet been implemented. At the Board's direction, the Chief Information Officer, as part of the Data Center Consolidation Initiative is working with County departments to establish a County Data Center Governance Committee to facilitate the consolidation of the county data centers into a consolidated County Data Center operated by Information Technology Services.

RECOMMENDATION NO. 4.17

Where feasible, and when the proposed centralized data facility is operational, the Los Angeles County Board of Supervisors should require the transfer of outsourced production systems to that facility.

RESPONSE

Agree. This recommendation has not yet been implemented. At the Board's direction, the Chief Information Officer has completed a County Data Center Assessment and Consolidation Strategy. When fully implemented, the Chief Information Executive Officer will work with appropriate departments to evaluate the business case to determine if would be beneficial to transfer hosted production systems to the consolidated County Data Center.

COUNTY OF LOS ANGELES – Chief Executive Office (Public Safety)

SUBJECT: 2014-2015 GRAND JURY RECOMMENDATIONS FOR  
OVERSIGHT OF THE SHERIFF AND POWERS FOR THE OFFICE OF  
INSPECTOR GENERAL

RECOMMENDATION NO. 8.1

The Board of Supervisors should ensure that the Office of the Inspector General (OIG) has complete access to all Los Angeles County Sheriff's Department confidential and employee records, with stringent rules against public release.

RESPONSE

This recommendation will be discussed with the Board of Supervisors in conjunction with the formation of the Sheriff's Department Civilian Oversight Commission. The Oversight Work Group has recommended to the Board that the OIG and the Sheriff enter into a Memorandum of Understanding giving the OIG access to confidential records.

RECOMMENDATION NO. 8.2

The Board of Supervisors should set a fixed term for the inspector general.

RESPONSE

This recommendation will be discussed with the Board of Supervisors in conjunction with the Sheriff's Department Civilian Oversight Commission formation. The Oversight Work Group recommended to the Board that the OIG ordinance be revised to account for the new Civilian Oversight Commission.

COUNTY OF LOS ANGELES – Chief Executive Office (Public Safety)

SUBJECT: 2014-2015 GRAND JURY RECOMMENDATIONS FOR  
SYBIL BRAND COMMISSION

RECOMMENDATION NO. 10.1

The Los Angeles County Board of Supervisors should clarify the Sybil Brand Commission (SBC) for Institutional Inspections' obligation and right to inspect juvenile group homes.

RESPONSE

The respondent agrees with the finding. The recommendation requires further analysis, as the previous finding by the Los Angeles Audit Committee is over two years old (June 17, 2013) and will require an updated review to ensure that this recommendation is still valid.

Within the next six months, the matter will be brought forth in an upcoming Los Angeles Audit Committee agenda. If the finding is still valid, the recommendation that the County Code be amended to explicitly give the SBC the duty to inspect juvenile group homes will be brought forth to County Counsel to make the necessary changes to the County Code. If the finding is no longer relevant, no further action will be taken.

# **Attachment B**

## **Chief Information Office**



RICHARD SANCHEZ  
CHIEF INFORMATION OFFICER

## COUNTY OF LOS ANGELES

### CHIEF INFORMATION OFFICE

Los Angeles World Trade Center  
350 South Figueroa Street, Suite 188  
Los Angeles, CA 90071

Telephone: (213) 253-5600  
Facsimile: (213) 633-4733

July 17, 2015

To: Sachi A. Hamai  
Interim Chief Executive Officer

From: Richard Sanchez  
Chief Information Officer

A handwritten signature in black ink, reading "Richard Sanchez", is written over the printed name and title.

### 2014-15 LOS ANGELES COUNTY CIVIL GRAND JURY FINAL REPORT

In response to your memo dated July 2, 2015, attached is our response to the 2014-2015 Civil Grand Jury Report Recommendation numbers 4.1-4.7, 4.10, 4.13-4.16, 4.18 and CEO Operations 4.8, 4.9, 4.17.

If you have any questions regarding this matter, please contact me at 213-253-5600 or [rsanchez@cio.lacounty.gov](mailto:rsanchez@cio.lacounty.gov).

RS:pa

Attachment

c: Jerry Ramirez, Chief Executive Office

P:\Grand Jury\2014-2015 Civil Grand Jury Response.docx

## **RESPONSE TO THE CIVIL GRAND JURY FINAL REPORT**

COUNTY OF LOS ANGELES – CHIEF INFORMATION OFFICE

SUBJECT: 2014-2015 CIVIL GRAND JURY RECOMMENDATIONS FOR  
SECTION TITLE

RECOMMENDATION NO. 4.1- Los Angeles County's Chief Information Officer should require, upon the completion of a software development project above the Los Angeles County Board of Supervisors' cost threshold, a measurement of the efficiency of the development project, and the Chief Information Officer should keep this measurement as a permanent record.

RESPONSE Agree. This recommendation has not yet been implemented and will require additional resources and analysis to implement. The County's Chief Information Officer will work with the Chief Executive Office to request funds to establish a County Program Management Office (CPMO) in the Fiscal Year 2016-17 Budget. The CPMO will be responsible for fostering project management best practices, which will include defining and measuring the performance and efficiencies to be achieved by information technology (IT) projects. The Chief Information Officer is replacing the Business Automation Plan with an IT Project/Application Portfolio Management tool that will be used as the repository for all IT projects, applications and measurements.

RECOMMENDATION NO. 4.2 - The Los Angeles County Chief Information Officer should require, upon the completion of software development projects above Los Angeles County Board of Supervisors' cost threshold, a measure of the success of the system (productivity metric), and the Chief Information Officer should keep this measurement as a permanent record.

RESPONSE Agree. This recommendation has not yet been implemented and will require additional resources and analysis to implement. The County's Chief Information Officer will work with the Chief Executive Office to fund and establish a CPMO in the Fiscal Year 2016-17 Budget. The CPMO will be responsible for fostering project management best practices, which will include defining and measuring the performance and key success factors for information technology (IT) projects. The Chief Information Officer is replacing the Business Automation Plan with an IT Project/Application Portfolio Management tool that will be used as repository for all county IT projects, applications and these measurements.

RECOMMENDATION NO. 4.3 - The Los Angeles County Chief Information Officer should establish a centralized quality control group to monitor the progress and problems of system development projects.

RESPONSE Agree. Currently, the Sr. Associate CIOs within the Office of the CIO currently provides oversight for key IT projects within their assigned departments. The

Chief Information Officer will work with the Chief Executive Office to request funds to establish a CPMO in the Fiscal Year 2016-17 Budget, which will define comprehensive measures for project progress oversight of IT projects.

RECOMMENDATION NO. 4.4 - The Los Angeles County Chief Information Officer should provide a system development guideline. While not meant to constrain the development approach, the guideline should standardize the steps and deliverables at the end of each step of the system development process.

RESPONSE Agree. This recommendation has not yet been implemented and will require additional resources and analysis. The County's Chief Information Officer will work with the Chief Executive Office to request funds to establish a CPMO in the Fiscal Year 2016-17 Budget. The CPMO will develop recommended IT project management processes, guides, templates, and tools.

RECOMMENDATION NO. 4.5 - The Los Angeles County Chief Information Officer should provide a project management guideline or standard so that anyone can look at the project plan and see whether the project is on schedule or behind schedule.

RESPONSE Agree. This recommendation has not yet been implemented and will require additional resources and analysis. The County's Chief Information Officer will work with the Chief Executive Office to request funds to establish a CPMO in the Fiscal Year 2016-17 Budget. The CPMO will develop IT project management guidelines and standards. Additionally, an upgraded IT Project/Application Portfolio Management tool will be used as a repository for selected IT projects and will list project milestones and schedules.

RECOMMENDATION NO. 4.6 - The Los Angeles County Chief Information Officer should provide training in its guidelines and standards.

RESPONSE Agree. This recommendation has not yet been implemented and will require additional resources for implementation. The County's Chief Information Officer will work with the Chief Executive Office to request funds to establish a CPMO in the Fiscal Year 2016-17 Budget. This proposed CPMO will provide training to departments on recommended IT project management processes and guideline.

RECOMMENDATION NO. 4.7 - The Los Angeles County Chief Information Officer should continue to promulgate security standards.

RESPONSE Agree. This recommendation has been implemented. An Information Security Program and designated a Chief Information Security Officer (CISO) has been created to lead and coordinate the County's information security efforts across departments. The CISO collaborates with an Information Security Steering Committee comprised of departmental information security officers to develop, issue and update information security standards.

RECOMMENDATION NO. 4.10 - The chief data officer of the Los Angeles County Chief Information Officer should continue to standardize county data.

RESPONSE Agree. This recommendation has been implemented. The County has adopted County Policy 6.200 Information Sharing and Management Policy and has designated a Chief Data Officer to lead a Data Governance Council to coordinate the County's information management and sharing efforts across departments, including improving data quality, data management, and standardization of County data.

RECOMMENDATION NO. 4.13 - The Los Angeles County Chief Information Officer should provide programming standards for each programming language used within Los Angeles County.

RESPONSE Agree. This recommendation has not yet been implemented and will require additional resources and analysis to implement. The County's Chief Information Officer will work with the Chief Executive Office to request funds to establish an Enterprise Architect in the Fiscal Year 2016-17 Budget. The Enterprise Architect will be responsible for developing and promoting the use of common technology platforms and standards, including those for software development.

RECOMMENDATION NO. 4.14 - The Los Angeles County Chief Information Officer should provide a guideline on the selection of a programming language for the development of new systems.

RESPONSE Agree. This recommendation has not yet been implemented and will require additional resources and analysis to implement. The County's Chief Information Officer will work with the Chief Executive Office to request funds to establish an Enterprise Architect in the Fiscal Year 2016-17 Budget. The Enterprise Architect will be responsible developing and promoting the use of common technology platforms and standards, including those for software development.

RECOMMENDATION NO. 4.15 - The Los Angeles County Chief Information Officer should recommend that departments with COBOL-based systems but insufficient numbers of COBOL programmers should consider using Information Technology Service support.

RESPONSE Agree. This recommendation has been implemented. All mainframe-based COBOL applications are currently being maintained by Information Technology Services of the Internal Services Department.

RECOMMENDATION NO. 4.16 - The Los Angeles County Chief Information Officer should provide in-house training and formal classes as needed.

RESPONSE Agree. This recommendation has not yet been implemented and will require additional resources and analysis. The County's Chief Information Officer will work with the Chief Executive Office to fund and establish a CPMO in the Fiscal Year



2016-17 Budget. The CPMO will be responsible for fostering project management best practices which will include training, as appropriate.

RECOMMENDATION NO. 4.18 - The Los Angeles County Chief Information Officer should require a cost-benefit analysis to be provided by the department to the Los Angeles County Chief Information Officer to assess whether it is better to upgrade the existing system or acquire a new system.

RESPONSE Agree. This recommendation has not yet been implemented and will require additional resources and analysis to implement. The County's Chief Information Officer will work with the Chief Executive Office to request funds to establish a CPMO in the Fiscal Year 2016-17 Budget. This proposed CPMO will develop a recommended Business Case proposal that will require comparison of solution alternatives and provide a basis for selecting the one that delivers greatest value.

# **RESPONSE TO THE CIVIL GRAND JURY FINAL REPORT**

COUNTY OF LOS ANGELES – CHIEF EXECUTIVE OFFICE - OPERATIONS

SUBJECT: 2014-2015 CIVIL GRAND JURY RECOMMENDATIONS FOR  
SECTION TITLE

RECOMMENDATION NO. 4.8 - The Los Angeles County Board of Supervisors should provide ITS and the other county data centers with secure facilities.

RESPONSE Agree. This recommendation has not yet been implemented. At the Board's direction, the Chief Information Officer has completed a County Data Center Assessment and Consolidation Strategy. The results of this work is currently used by the Chief Executive Office to evaluate the "build, buy, lease" options for a consolidated County Data Center. The report from the Chief Executive Office is scheduled to be completed in August 2015.

RECOMMENDATION NO. 4.9 - The Los Angeles County Board of Supervisors should promote production hosting by Information Technology Service.

RESPONSE Agree. This recommendation has not yet been implemented. At the Board's direction, the Chief Information Officer, as part of the Data Center Consolidation Initiative is working with County departments to establish a County Data Center Governance Committee to facilitate the consolidation of the county data centers into a consolidated County Data Center operated by Information Technology Services.

RECOMMENDATION NO. 4.17 - Where feasible, and when the proposed centralized data facility is operational, the Los Angeles County Board of Supervisors should require the transfer of outsourced production systems to that facility.

RESPONSE Agree. This recommendation has not yet been implemented. At the Board's direction, the Chief Information Officer has completed a County Data Center Assessment and Consolidation Strategy. When fully implemented, the Chief Information Executive Officer will work with appropriate departments to evaluate the business case to determine if would be beneficial to transfer hosted production systems to the consolidated County Data Center.

# **Attachment C**

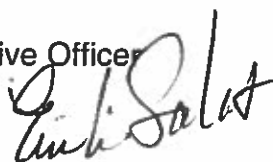
## **Community Development Commission**

## **Community Development Commission**

July 22, 2015

TO: Sachi Hamai, Interim Chief Executive Officer

FROM: Sean Rogan, Executive Director



**SUBJECT: LOS ANGELES COUNTY 2014-2015 CIVIL GRAND JURY FINAL REPORT, AFFORDABLE HOUSING, JUNE, 2015**

The Community Development Commission (CDC) of the County of Los Angeles is in receipt of the affordable housing section of the 2014-2015 Civil Grand Jury Final Report (Final Report). This memorandum is pursuant to California Penal Code Section 933 which requires comment on the Final Report to the presiding judge.

The CDC values the efforts of the 2014-2015 Civil Grand Jury in their investigation and review of the state of affordable housing and its tremendous need in Los Angeles County. We appreciate the opportunity to respond to the Findings and Recommendations of the Final Report. In addition; to our responses, the final section of this memorandum entitled "Factual Corrections and Comments" is intended to ensure that the Final Report is factually correct and clarifies certain statements. Inclusion of this information will better facilitate an understanding of how diligently the CDC carries out its affordable housing stewardship responsibilities.

In accordance with California Penal Code Section 933.05 (b) the following are our responses to the Findings:

### **FINDINGS**

1. Los Angeles County funding for affordable housing expires in 2017.

**Response:** The respondent agrees with the finding.

2. The Community Development Commission's 20 percent administration fee for affordable housing projects may not be sufficient to cover long-term monitoring costs of those projects.

**Response:** The respondent agrees with the finding.

3. A Los Angeles County Board of Supervisors 2013 resolution releases county general funds, to the Community Development Commission for affordable housing, over five years.

**Response:** The respondent agrees with the finding.

4. The Community Development Commission Tracker project management reports in their current format do not provide the Board of Supervisors with sufficient information needed to perform ongoing oversight, particularly original budget vs. actual expenditures and original vs. revised timelines by project.

**Response:** The respondent partially disagrees with the finding. The CDC's Tracker project management reports, in their current, format provide the Board of Supervisors with sufficient information needed to perform appropriate oversight. To the extent that additional information is required by the Board of Supervisors, the CDC will provide the data through Tracker or an alternative report.

5. The Board of Supervisors, sitting as the Commissioners of the Community Development Commission, has not taken a sufficiently active role in providing comprehensive oversight of all projects after funding allocations are made.

**Response:** The respondent disagrees with the finding.

As previously stated in greater detail in our March 16, 2015 memorandum to Amanda Guma, Senior Manager of Harvey M. Rose Associates, regarding our review of the Draft Audit, dated March 10, 2015, the CDC has had a long history as the County's public lender in affordable housing development. Since the mid-1990's, the CDC has administered federal and redevelopment set-aside funds guided by systems and policies and procedures in response to the Board's administrative plan for these redevelopment set-aside funds. These years of effort developed into a highly-regarded and trusted Notice of Funding Availability (NOFA) underwriting and asset management program that has withstood scrutiny and maintained transparency. It is for these reasons that the Board allocated funds to the CDC to ensure the continued development of needed affordable housing when the main local source of funding from redevelopment agencies was lost in 2011. This program has served the County well in that it has brought six to seven times its investment by leveraging its allocation.

The ongoing comprehensive oversight of all projects, after funding allocations are made, is the responsibility of the highly experienced CDC staff. And, as also noted in the memorandum, monthly meetings with the deputies from all five Board Districts offer them the opportunity to inquire about any project, based upon their review of the monthly Project Tracker reports that they receive.

6. The Board of Supervisors has not fully adopted the 2012 Affordable Housing and Economic Development Framework and Implementation Strategy and has underfunded the affordable housing development goals by \$98,196,500.

**Response:** The respondent partially disagrees with the finding.

It is accurate to state that the Board of Supervisors has not fully adopted the 2012 Affordable Housing and Economic Development Framework and Implementation Strategy. However, the Board of Supervisors had been faced with uncertainties regarding the funding that would accrue to the County in the wake of redevelopment dissolution and, therefore, was not in a position to fully fund the loss of redevelopment funds or declining federal funds. As the accumulation of additional funds to the County became more predictable, the Board funded affordable housing and other competing demands with the incremental increases to the General Fund. It should be noted that the CDC has drafted a 2015 Update of the Affordable Housing Development Framework which will be presented to the Board for consideration.

7. Staffing levels may be insufficient if Notices of Funding Availability of a higher value are released.

**Response:** The respondent agrees with the finding.

In accordance with California Penal Code Section 933.05 (b) the following are our responses to the Recommendations:

### **RECOMMENDATIONS**

1.1 The Los Angeles County Community Development Commission should review the recommendations made in the 2012 Affordable Housing and Economic Development Framework and Implementation Strategy regarding affordable housing funding and goals and revise accordingly, in collaboration with the Chief Executive Office, to determine current and future funding needs.

**Response:** The recommendation has not yet been implemented, but will be implemented in the future.

The paths of Affordable Housing and Economic Development programs have diverged and are covered under separate initiatives. A draft Affordable Housing Development Framework, 2015 Update has been completed, and focuses only on affordable housing needs and solutions. The 2015 Framework will be submitted to the Chief Executive Office (CEO) and to the Board of Supervisors in September, 2015.

1.2 The Community Development Commission should continue to analyze project delivery costs associated with county-funded affordable housing developments to ensure that the 20 percent administration fee is appropriate.

**Response:** The recommendation requires further analysis.

The draft Affordable Housing Development Framework, 2015 Update addresses this issue. Once the CEO and Board have an opportunity to review the 2015 Framework this Fall, it is anticipated that administrative fees will be a topic for discussion.

1.3 The Community Development Commission should determine how staffing levels would need to be adjusted, including whether consultants may be needed, to release Notices of Funding Availability of a higher value, should the Board of Supervisors decide to request the county funds be allocated to projects more expeditiously.

**Response:** The recommendation has not yet been implemented, but will be implemented in the future.

The CDC's decision to adjust staffing levels and/or employ consultant services will depend on forecasting needs and estimating workloads. Again, the draft Affordable Housing Development Framework, 2015 Update speaks to this issue. The estimated timeframe for increasing staffing levels, if any, will be four months in advance of any funding-enhanced NOFA.

1.4 The Community Development Commission should revise the project summary reports produced in Tracker to show additional data fields, including original and actual completion dates, budgeted and actual county and other funding source expenditures to date, and number of affordable and special needs units in each project.

**Response:** The recommendation requires further analysis.

We have been reviewing the limitations of the existing Tracker system to accept additional fields. However, this type of information is available upon request and the CDC has provided it accordingly to the CEO and the Board offices. The Funding Agreements that authorize the transfer of funds from the County to the CDC only require an annual fiscal year-end report. It should be noted that the CDC is in the process of procuring for a software consultant to assess the Tracker system.

1.5 The Community Development Commission should submit Notices of Funding Availability that include county funds to the Board of Supervisors for review prior to release.

**Response:** The recommendation will not be implemented because it is not warranted.

The monthly meetings, with the deputies from all five Board Offices, offer the CDC opportunities to provide information and answer inquiries about the criteria and funding levels proposed for NOFAs, and to receive to any comments back prior to NOFA issuance.

The Board Offices are aware that the CDC's annual staff review and revision of the NOFA criteria and funding amounts take into consideration what other public resources are available for affordable housing, as well as long-term operational objectives for the development, and any other public policy objectives that would enhance the lives of tenants or improve the neighborhoods in which these developments are located. Stakeholder meetings are held periodically to obtain feedback on specific issues or proposed changes.

Moreover, as mentioned in the March 10, 2015 memorandum noted above, the Board of Commissioners provides broad direction and sets priorities for how affordable housing funds are to be allocated through the NOFA, but has chosen not to exercise hands-on management. As stated in the October 23, 2012 Motion to transfer the initial \$11 million: "The CDC has a strong track record of facilitating a quality affordable housing procurement process." On March 5, 2013, the Board stated that the Affordable Housing Trust Fund shall be disbursed through the "established affordable housing Notice of Funding Availability."

1.6 The Community Development Commission should present to the Board of Supervisors more comprehensive monthly reports of all county funded affordable housing projects.

**Response:** The recommendation requires further analysis.

The Board Offices receive the Tracker Reports on a monthly basis. As noted in our response to Recommendation 1.4 above, we are exploring the ability of the existing Tracker system to accept additional data. However, this type of information is available upon request and the CDC has provided it accordingly to the CEO and the Board offices. The CDC will expeditiously comply with Board of Supervisors' requests for more comprehensive monthly reports of all County-funded affordable housing projects.

1.7 The Los Angeles County Board of Supervisors should review current funding levels to the Community Development Commission for affordable housing development to ensure that the levels are sufficient to reach county goals in light of the Affordable Housing and Economic Development Framework and Implementation Strategy.

**Response:** The CEO to respond.

1.8 The Board of Supervisors should amend its 2013 motion and allow the Community Development Commission to release the county General Funds more expeditiously.

**Response:** The CEO to respond.

1.9 The Board of Supervisors should consider permanent funding sources for affordable housing development, including a housing impact fee.



**Response:** The CEO to respond.

**FACTUAL CORRECTIONS and COMMENTS**

- **Affordable Housing Funding**

- Page 3, Paragraph 1, Line 9 – Correct the following sentence to read:

*Los Angeles County complies with the state of California-mandated density bonus program, which allows market-rate developers to add units to their projects if affordable units are included. Delete the remainder of the sentence.*

- **Dissolution of California Redevelopment Agencies**

- Page 4, Paragraph 2, Line 4 – Correct the following sentence to read:

*For Los Angeles County's former redevelopment agency, the CDC has assumed the functions of Redevelopment Successor Agency.*

- **Los Angeles County Community Development Commission**

- Page 4, Paragraph 3, Line 1 – Correct the sentence to read:

*In 1982, the Los Angeles County Board of Supervisors (BOS) brought together three entities: the Housing Authority, the County Community Development Department and the County Redevelopment Agency under the CDC.*

- Page 4 – Correct the last sentence of the page to read:

*The CDC's affordable housing development projects are managed internally in the Economic and Housing Development Division's Development Unit.*

- **Methodology**

- Page 5, Paragraph 2, Bullet 2 – correct the sentence to read:

*Review all actions by the BOS to determine the Board's plans for all of the funds transferred to the CDC for affordable housing programs.*

- **County General Fund Allocations: Notices of Funding Availability**

- Page 8 – correct the following sentence to read:

*Of these funds transferred from the County, \$38,139,000 in County General funds has been made available to affordable housing developers thus far by the CDC through NOFAs18-20, along with other funding sources such as Homeless Bonus Funds and HOME funds.*

- **County General Fund Allocations: Notices of Funding Availability**
  - Page 9, Paragraph 3 – The last sentence in the third paragraph should be placed right after the first sentence.
  -
- **Oversight of Projects/CDC housing development project management**
  - Page 17, Paragraph 1, Line 2 – correct the sentence to read:

*This unit oversees all County affordable housing projects utilizing financing through the CDC from County sources and the federal HOME program.*

- Page 17, Paragraph 5, Line 1 – The sentence that begins “The project manager maintains responsibility...” should be replaced with the following:

*The Project Manager's primary responsibility is to be a good steward of public funds by performing underwriting, due diligence, budgeting and administrative tasks to ensure that the appropriate subsidy amount is used to produce affordable housing. Project Managers act as finance officers for the CDC in its public lender capacity.*

If you have any questions or require further information, please contact me at (626) 586-1500.

CC:PY:/nb/H:m-Response to Final Audit 7-22-15.docx

c: Jerry Ramirez, Senior Analyst  
Montessa Duckett, CEO Analyst  
Rochelle Goff, Manager, CEO

# **Attachment D**

## **Executive Office of the Board**



**PATRICK OGAWA**  
ACTING EXECUTIVE OFFICER

## COUNTY OF LOS ANGELES BOARD OF SUPERVISORS

KENNETH HAHN HALL OF ADMINISTRATION  
500 WEST TEMPLE STREET, ROOM 383  
LOS ANGELES, CALIFORNIA 90012  
(213) 974-1411 • FAX (213) 620-0636

MEMBERS OF THE BOARD

HILDA L. SOLIS

MARK RIDLEY-THOMAS

SHEILA KUEHL

DON KNABE

MICHAEL D. ANTONOVICH

July 17, 2015

Sachi A. Hamai  
Interim Chief Executive Officer  
Chief Executive Office  
500 West Temple Street, Room 713  
Los Angeles, CA 90012

Dear Ms. Hamai:

As requested in your memo of July 2, 2015 to provide a response to the 2014-15 Los Angeles County Civil Grand Jury Final Report, our office has consulted with the Los Angeles County Sybil Brand Commission for Institutional Inspections for their feedback on the findings and any action to implement the recommendations.

We have attached in the requested format the responses and action to be implemented by the Los Angeles County Sybil Brand Commission for Institutional Inspections for Findings 1 and 2 and Recommendation 10.2 of the Civil Grand Jury's Report.

Should you have any questions regarding the response as submitted, please contact Twila P. Kerr at (213) 974-1431.

Sincerely,

  
Patrick Ogawa  
Acting Executive Officer

PO:tpk

Attachment

c: Sybil Brand Commission on Institutional Inspections

## RESPONSE TO THE CIVIL GRAND JURY FINAL REPORT

### COUNTY OF LOS ANGELES – EXECUTIVE OFFICE, BOARD OF SUPERVISORS

SUBJECT: 2014-2015 CIVIL GRAND JURY RECOMMENDATIONS FOR SYBIL BRAND COMMISSION

The Los Angeles County Sybil Brand Commission (SBC) has reviewed the findings and recommendations of the 2014-2015 Civil Grand Jury's Final Report. The proposed recommendation by the Civil Grand Jury has yet to be implemented; however, subject to amendments and approval of the SBC's by-laws the Commission plans to implement the recommendation by October 1, 2015. The following are their comments to findings 1 and 2, and recommendation 10.2:

#### FINDINGS:

1. The Sybil Brand Commission provides valuable services in inspecting juvenile group homes. The legal basis for SBC's inspection of the group homes is not clear, and the Sunset Commission has recommended to the Los Angeles County Board of Supervisors that the code be amended to explicitly give the SBC that duty.

***The SBC agrees with the finding and recommends that the Board of Supervisors take appropriate action to implement this recommendation during the sunset review process.***

2. Replacing the weekly meetings of the SBC with comprehensive jail inmate and staff interviews would provide the SBC with a more useful presence in the jails.

#### RECOMMENDATION 10.2

The Sybil Brand Commission for Institutional Inspections should conduct additional and more-comprehensive jail inmate and staff

interviews, which the SBC can accomplish by reducing the number of its meetings.

***The SBC agrees with this finding and recommendation of 10.2. The SBC plans to reduce the number of weekly meetings to twice a month. During the weeks when there are no SBC meetings, the Commission will spend its time conducting commission business and inspections, which includes additional and more comprehensive jail inmate and staff interviews. Additionally, SBC is reviewing their processes for the inspection of jail facilities, including meetings with the Sheriff and Probation Departments to enhance protocols to maximize inspections in a more efficient manner.***

# **Attachment E**

## **Internal Services**



JIM JONES  
Director

# County of Los Angeles INTERNAL SERVICES DEPARTMENT

1100 North Eastern Avenue  
Los Angeles, California 90063

*"To enrich lives through effective and caring service"*

Telephone: (323) 267-2136  
FAX: (323) 264-7135

July 16, 2015

To: Sachi A. Hamai  
Interim Chief Executive Officer  
Chief Executive Office

Attention: Jerry Ramirez  
Principal Analyst  
Chief Executive Office

From: Dave Chittenden   
Chief Deputy Director

Subject: **INTERNAL SERVICES DEPARTMENT'S RESPONSE TO THE  
FY 2014-15 LOS ANGELES COUNTY CIVIL GRAND JURY  
FINAL REPORT**

As requested, attached are our responses for the recommendations made by the Civil Grand Jury in their Final Report. The Internal Services Department was identified to respond to recommendations 4.11 and 4.12 in the Information Technology Services Section of the Final Report.

In summary, we concur with the recommendations and will implement them as identified in our response.

Please contact David Yamashita at (323) 267-2136 or via email at [dyamashita@isd.lacounty.gov](mailto:dyamashita@isd.lacounty.gov) with any questions on our response.

DC:DY:dy

Attachment

c: Tom Travis  
David Yamashita



## **RESPONSE TO THE CIVIL GRAND JURY FINAL REPORT**

COUNTY OF LOS ANGELES: INTERNAL SERVICES DEPARTMENT

SUBJECT: 2014-2015 CIVIL GRAND JURY RECOMMENDATIONS FOR  
INFORMATION TECHNOLOGY SERVICE

### **RECOMMENDATION NO.**

**4.11.**

### **RESPONSE**

ISD agrees with the recommendation. The County CIO Council is the current forum for information technology discussions and will include a customer Steering Committee focused on service delivery by the ISD/Information Technology Service for the new County Data Center. The governance charter for the Steering Committee will be developed in Fiscal Year 2015-16.

### **RECOMMENDATION NO.**

**4.12.**

### **RESPONSE**

ISD agrees with the recommendation. ISD has a number of targeted service-level agreements with client departments in place today. The ISD Information Technology Service will comprehensively expand the number of service-level agreements to fully cover the ISD/ITS Service Catalog with the next updates.

# **Attachment F**

## **Probation**



# COUNTY OF LOS ANGELES PROBATION DEPARTMENT

9150 EAST IMPERIAL HIGHWAY – DOWNEY, CALIFORNIA 90242

(562) 940-2501



**JERRY E. POWERS**  
Chief Probation Officer

July 17, 2015

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
Los Angeles, California 90012

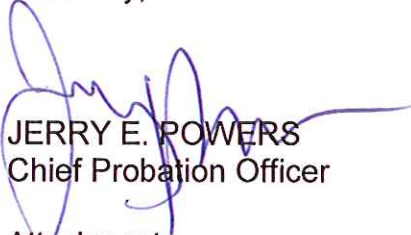
Dear Supervisors:

## RESPONSE TO THE 2014-2015 LOS ANGELES COUNTY CIVIL GRAND JURY FINAL REPORT

Attached is the Probation Department's response to the 2014-2015 Los Angeles County Civil Grand Jury Final Report regarding the Detention Committee's recommendations pertaining to their inspection of juvenile facilities.

Please contact me if you have any questions or require additional information, or your staff may contact Amalia Lopez, Executive Assistant, at (562) 940-3553, or [amalia.lopez@probation.lacounty.gov](mailto:amalia.lopez@probation.lacounty.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Jerry E. Powers", written over a printed name and title.

JERRY E. POWERS  
Chief Probation Officer

Attachment

c: Sachi A. Hamai, Interim Chief Executive Officer

**RESPONSE TO THE CIVIL GRAND JURY FINAL REPORT**

**COUNTY OF LOS ANGELES – PROBATION DEPARTMENT**

**SUBJECT: 2014-2015 CIVIL GRAND JURY RECOMMENDATIONS FOR  
DETENTION JUVENILE FACILITIES**

**RECOMMENDATION NO. 14.7**

The Los Angeles County Probation Department (Probation) should repair/upgrade the Inglewood Juvenile Courthouse Jail. In addition, Probation should ensure the facility passes annual health inspections without any issues. Probation should install a refrigerator instead of using a portable cooler for storing food for juveniles. Probation should streamline the 911 emergency call processes at this facility.

**RESPONSE**

The Probation Department works with the Department of Public Health and our partners, the Department of Health Services' Juvenile Court Health Services and the Department of Mental Health, on facility health inspections to correct deficiencies identified during such inspections. Minor maintenance and facility issues are addressed by the Department; however, structural and major repairs are reported to the Superior Court for repair. Additionally, the Probation Department has access to refrigerators in the youth holding area. Coolers are utilized to transport the food from the facility to court at which time, food is transferred from the cooler to the refrigerators. Management will issue a reminder to staff that food is to be placed in the refrigerator once youth arrive at court. Lastly, the Department currently has a robust 911 emergency protocol; management will review and reissue the applicable policy to staff.

**RECOMMENDATION NO. 14.9**

Probation should resolve staffing-level issues at its camps and properly maintain first aid kits there.

**RESPONSE**

The Probation Department agrees with this recommendation. The Department has already increased the number of staff assigned to all of the Camps, which has resulted in a higher, day-to-day, staff-to-youth ratio. The enhanced staffing ratios were implemented to ensure the effective service delivery and supervision for detained youth. The enriched staffing ratios have remained in place and have resulted in improved outcomes for youth. Staffing ratios were approved under the Department of Justice Settlement Agreement,

effective November 1, 2013. Additionally, the Department has ensured that all first aid kits are fully stocked.

### **Camp-Specific Concerns and Department's Actions**

#### Camp Afflerbaugh

- Unsatisfactory; first aid kits have no supplies: All first aid kits are fully stocked.
- Dirty facility: The Department has established ongoing daily inspections. Effective August 2014, staff have been designated to inspect for cleanliness, and compliance with Title 15 mandates.
- Staffing Needs: Please see response to recommendation 14.9.

#### Camp Munz

- Basketball courts need resurfacing: The Probation Department is in the process of replacing the athletic courts at both Camps Munz/Mendenhall. A request for funding has been submitted to the Chief Executive Office and is pending.
- Restrooms need cleaning: The Department has established ongoing daily inspections. Designated staff inspect for cleanliness, and compliance with Title 15 mandates.

#### Camp Paige

- Staffing needed: Please see response to recommendation 14.9.

#### Camp Rockey

- Unsatisfactory; dorm floors need sweeping; dirty shower area with odor: The Department has established ongoing daily inspections. Effective August 2014, staff have been designated to inspect for cleanliness, and compliance with Title 15 mandates. Upon a re-inspection of the facility, the issues had been corrected.

#### Camp Scott

- Couch replacement needed: The torn/damaged sofa was removed and new furniture was ordered and received for the Assessment Center.

Camp Scudder

- Security issues due to no lights in parking area: Additional perimeter lighting to both Camps Scott/Scudder has been added. This project was completed on May 1, 2015.

Challenger Memorial Youth Center Camps Jarvis, Onizuka, and McNair

- Vocational training materials are needed: All current vocational classes at the Challenger Memorial Youth Center have the required materials. A new vocational class, Silk Screening, was piloted in 2014. The youth expressed an interest in the new class. As a result, the Probation Department, in collaboration with the Los Angeles County Office of Education, is targeting implementation of the program in September 2015. Equipment is being purchased and installed.

# **Attachment F**

## **Sheriff**



# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

JIM McDONNELL, SHERIFF



July 17, 2015

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
Los Angeles, California 90012

Dear Members of the Civil Grand Jury:


## RESPONSE TO THE FINAL REPORT OF THE 2014-15 LOS ANGELES COUNTY CIVIL GRAND JURY

Attached is the Los Angeles County Sheriff's Department's (Department) response to the 2014-15 Los Angeles County (County) Civil Grand Jury (Civil Grand Jury) Report recommendations. This Civil Grand Jury inquired into the condition and management of the public prisons within the County. This included jails that housed adults and were operated by municipal police agencies; jails and courthouse lockups controlled by the Department; and facilities for minors incarcerated in juvenile halls and camps under the supervision of the County's Probation Department.

The tremendous effort and dedication made by the members of the Civil Grand Jury's Detention Committee to execute this extensive inspection mandate is greatly appreciated by the Department. The Department truly values the inspection team's comments relating to the station jails, court lockups, and jail facilities under the Department's control, and will continually strive to meet and/or exceed the recommendations included in this report.

Should you have any questions regarding the Department's response, please contact Division Director Glen Dragovich, Administrative and Training Division, at (213) 229-3305.

Sincerely,



JIM McDONNELL  
SHERIFF

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —



JM:GD:RD:rd

(Administrative and Training Division)

c: Board of Supervisors, Justice Deputies  
Patrick Ogawa, Acting Executive Officer, Board of Supervisors  
Sachi A. Hamai, Interim Chief Executive Officer  
Brence Culp, Chief Deputy Chief Executive Officer  
Sheila Williams, Senior Manager, Chief Executive Office (CEO)  
Jocelyn Ventilacion, Lead Analyst, CEO  
Aileen Yu, Senior Analyst, CEO  
Brian Lew, Public Affairs Office  
Mary C. Wickham, Interim County Counsel  
Michele Jackson, Principal Deputy County Counsel  
Elizabeth D. Miller, Chief Legal Advisor, Legal Advisory Unit  
Neal B. Tyler, Executive Officer  
Richard J. Barrantes, Assistant Sheriff  
Terri McDonald, Assistant Sheriff  
Todd S. Rogers, Assistant Sheriff  
Michael J. Rothans, Assistant Sheriff  
Thomas P. Angel, Chief of Staff, Office of the Sheriff  
Tracee R. Allen, Acting Chief, Detective Division  
Glen Dragovich, Division Director, Administrative and Training Division (ATD)  
David L. Fender, Chief, Custody Services Division  
Dean M. Gialamas, Division Director, Technical Services Division  
Buddy Goldman, Chief, South Patrol Division  
Georgia Matter, Division Director, Office of the Sheriff  
James J. Hellmold, Chief, Countywide Services Division  
Jacques A. La Berge, Chief, North Patrol Division  
Eric G. Parra, Chief, Custody Services Division  
Earl M. Shields, Chief, Professional Standards Division  
Conrad Meredith, Assistant Division Director, ATD  
Dave Waters, Commander, ATD  
Ruthie V. Daily, Operations Lieutenant, ATD  
Bryan C. Aguilera, Sergeant, ATD  
Erick F. Martinez, Deputy, ATD  
Chrono File

(Report Back Information ltrs – Grand Jury Final Report 07-17-15)

## **RESPONSE TO THE CIVIL GRAND JURY FINAL REPORT**

COUNTY OF LOS ANGELES - SHERIFF

SUBJECT: 2014-2015 CIVIL GRAND JURY RECOMMENDATIONS AND FINDINGS  
FOR INQUIRIES INTO THE CONDITION AND MANAGEMENT OF THE  
PUBLIC PRISONS WITHIN THE COUNTY

### **RECOMMENDATION NO. 14.4**

The Los Angeles County Sheriff's Department (LASD) should communicate with the Judicial Council of California about the Bellflower Courthouse Jail building to resolve safety issues due to radio dead zones and to repair the alarm systems for exit doors. LASD should also upgrade the gun lock-up and ensure the temperature on the refrigerator meets the food safety standard.

### **RESPONSE**

The Department concurs with each of the four recommendations.

Experts from the Department's Sheriff's Communication Center (SCC) assessed the situation and found the dead zones to be in the stairwell areas, which have reinforced steel and dense concrete walls. While it would be optimal to have radios work flawlessly in these areas, full correction would require the construction of a new courthouse or the application of a technological solution that does not yet exist. Given this background, this issue will be raised with the Judicial Counsel of California (JCC) when the construction of new courthouse buildings is considered. The Department recognizes the availability of a new courthouse will be many years away, accordingly, the Department's SCC staff has since reviewed and adjusted the repeater dish to maximize the receptivity and broadcasting ability of the current radios.

In regard to the other issues, the exit-door alarms have been repaired. The Department is working through the Department's Facilities Services Bureau's (FSB) Sheet Metal Unit, to see if new gun lockers can be modified or newly constructed. A service request has been placed with FSB to have the refrigerator repaired to reduce the temperature from 45 degrees to the desired 41 degree level.

### **RECOMMENDATION NO. 14.5**

LASD should communicate with the Judicial Counsel of California (JCC) about repairing the Compton Courthouse holding area. LASD should ensure food for inmates is refrigerated properly.

## RESPONSE

The Department concurs with the Civil Grand Jury's recommendations as they relate to facility repair issues at the County's Compton Courthouse. The Department disagrees with the Civil Grand Jury's recommendations as they relate to the issue of inmate food refrigeration. The Department's Food Services Unit confirmed the lunches sent to Compton Court are those that do not require refrigeration.

As a result of the Civil Grand Jury's recommendations, repair requests have been submitted to America Building Maintenance (ABM) to address the specific areas of repair noted in the Civil Grand Jury's report (e.g. scratches to the walls and ceilings, general low water pressure in the lockup, painting, etc.).

## RECOMMENDATION NO. 14.6

LASD should remove graffiti in the cells at East Los Angeles Courthouse Jail and should ensure the turn-out gear fits the deputies working at this facility.

## RESPONSE

The Department concurs with the Civil Grand Jury's recommendations, and a request has been made with ABM to remove the graffiti.

New turnout gear was acquired to accommodate the assigned staff. Fire drill training has been conducted to ensure staff familiarity with the equipment.

## RECOMMENDATION NO. 14.8

The LASD should promptly resolve the ongoing plumbing and pest issues in the Men's Central Jail building without waiting to address the larger issue of overcrowding.

## RESPONSE

The Department concurs and fully supports this recommendation, and will continue to repair plumbing systems and address pest issues through routine and emergent maintenance.

The Department continually and consistently repairs and replaces aging plumbing systems and fixtures throughout the Department's Men's Central Jail (MCJ). The Department contracts for pest control services and ensures consistent abatement efforts are ongoing. While committed to resolving these problems, permanent solutions are difficult due to the aging facility.

There is currently an effort to replace the Department's MCJ with a correctional treatment facility, which is one of the long term solutions. To address the challenge of overcrowding, a comprehensive review of the Department's current and future inmate

housing needs is underway. In addition to the evaluation of capacity needs, the County is collaborating with non-profit organizations and community leaders exploring opportunities to reduce overcrowding through diversion, alternative custody options, recidivism reduction, and enhanced credit earning strategies. These efforts are ongoing.

# **Attachment H**

## **Matrix of Departmental Responses to Recommendations**

## DEPARTMENTAL RESPONSES TO RECOMMENDATIONS OF THE 2014-2015 CIVIL GRAND JURY FINAL REPORT

Chief Executive Office – Affordable Housing	
Recommendation	Response
#1.7 The Los Angeles County Board of Supervisors should review current funding levels to the Community Development Commission for affordable housing development to ensure that the levels are sufficient to reach county goals in light of the Affordable Housing and Economic Development Framework and Implementation Strategy.	<p>The recommendation requires further analysis.</p> <p>The Board of Supervisors, in consultation with the CDC and CEO, will continue its review of funding allocated to the CDC for affordable housing. This will include an analysis of the Affordable Housing Development Framework, 2015 Update when it is available this Fall. In light of the demonstrated need for affordable housing in the County, the Board seeks to maximize funding levels to meet County goals</p>
#1.8 - The Board of Supervisors should amend its 2013 motion and allow the Community Development Commission to release the county General Funds more expediently.	<p>The recommendation requires further analysis.</p> <p>As noted in our response to Recommendation 1.7, above, the Board of Supervisors, in consultation with the CDC and CEO, will review the 2015 Framework which will inform a decision about whether an accelerated release of previously committed General Funds for affordable housing funds is warranted. A key consideration will be the availability of sufficient funding for affordable housing development in subsequent years</p>
#1.9 - The Board of Supervisors should consider permanent funding sources for affordable housing development, including a housing impact fee.	<p>The recommendation requires further analysis.</p> <p>The Board of Supervisors will continue to consider permanent funding sources for affordable housing development, including the feasibility of impact fees as a source for affordable housing development. Jurisdictions in the County have a variety of “impact” or development related fees. Research indicates impact fees, include “capacity fees,” “facility fees,” “infrastructure fees,” “system development charges” and “capital recovery fees.”</p> <p>The common characteristics of such fees include: 1) charging only to new development; 2) standardized fees as opposed to ad hoc, negotiated payments; and 3) design and use to fund capital improvements and public services, such as schools, parks, libraries, fire and police services, roads and utilities needed to serve growth. Developers must pay these fees and meet the jurisdiction’s planning and zoning requirements before their projects are granted approval.</p>

<b>Chief Executive Office – Automated External Defibrillator</b>	
<b>Recommendation</b>	<b>Response</b>
#2.1 The implementation of a Public Access Defibrillator (PAD) program should remain discretionary within Los Angeles County. The Board of Supervisors should continue to allow each department to retain the choice of implementing or not implementing this program.	The County agrees with the Civil Grand Jury's recommendation to allow for departmental discretionary implementation of Automated External Defibrillators.
2.2 - The Board of Supervisors should implement education and training programs on the device before further investment	Departments that elect to implement Automated External Defibrillators obtain specific education and training as it pertains to the circumstances of the department. The County agrees with the Civil Grand Jury's recommendation that an expanded education and training program would need to be developed before further investment.
<b>Chief Executive Office – County Information Systems</b>	
<b>Recommendation</b>	<b>Response</b>
#4.8 - The Los Angeles County Board of Supervisors should provide ITS and the other county data centers with secure facilities.	Agree. This recommendation has not yet been implemented. At the Board's direction, the Chief Information Officer has completed a County Data Center Assessment and Consolidation Strategy. The results of this work is currently used by the Chief Executive Office to evaluate the "build, buy, lease" options for a consolidated County Data Center. The report from the Chief Executive Office is scheduled to be completed in August 2015.
#4.9 - The Los Angeles County Board of Supervisors should promote production hosting by Information Technology Service.	Agree. This recommendation has not yet been implemented. At the Board's direction, the Chief Information Officer, as part of the Data Center Consolidation Initiative is working with County departments to establish a County Data Center Governance Committee to facilitate the consolidation of the county data centers into a consolidated County Data Center operated by Information Technology Services.
#4.17 - Where feasible, and when the proposed centralized data facility is operational, the Los Angeles County Board of Supervisors should require the transfer of outsourced production systems to that facility.	Agree. This recommendation has not yet been implemented. At the Board's direction, the Chief Information Officer has completed a County Data Center Assessment and Consolidation Strategy. When fully implemented, the Chief Information Executive Officer will work with appropriate departments to evaluate the business case to determine if would be beneficial to transfer hosted production systems to the consolidated County Data Center.
<b>Chief Executive Office – Oversight of the Sheriff and Powers for the Office of the Inspector General</b>	
<b>Recommendation</b>	<b>Response</b>
#8.1 - The Board of Supervisors should ensure that the Office of the Inspector General (OIG) has complete access to all Los Angeles County Sheriff's Department confidential and employee records, with stringent rules against public release.	This recommendation will be discussed with the Board of Supervisors in conjunction with the formation of the Sheriff's Department Civilian Oversight Commission. The Oversight Work Group has recommended to the Board that the OIG and the Sheriff enter into a Memorandum of Understanding giving the OIG access to confidential records.

#8.2 - The Board of Supervisors should set a fixed term for the inspector general.	This recommendation will be discussed with the Board of Supervisors in conjunction with the Sheriff's Department Civilian Oversight Commission formation. The Oversight work Group recommended to the Board that the OIG ordinance be revised to account for the new Civilian Oversight Commission.
<b>Chief Executive Office – Sybil Brand Commission</b>	
<b>Recommendation</b>	<b>Response</b>
#10.1 - The Los Angeles County Board of Supervisors should clarify the Sybil Brand Commission (SBC) for Institutional Inspections' obligation and right to inspect juvenile group homes.	<p>The respondent agrees with the finding. The recommendation requires further analysis, as the previous finding by the Sunset Commission is over two years old (June 17, 2013) and will require an updated review to ensure that this recommendation is still valid.</p> <p>Within the next six months, the matter will be brought forth in an upcoming Sunset Commission agenda. If the finding is still valid, the recommendation that the Los Angeles County Code of Ordinance be amended to explicitly give the SBC the duty to inspect juvenile group homes will be brought forth to County Counsel to make the necessary changes to the Code of Ordinance. If the finding is no longer relevant, no further action will be taken.</p>
<b>Chief Information Office – County Information Systems</b>	
<b>Recommendation</b>	<b>Response</b>
#4.1 - Los Angeles County's Chief Information Officer should require, upon the completion of a software development project above the Los Angeles County Board of Supervisors' cost threshold, a measurement of the efficiency of the development project, and the Chief Information Officer should keep this measurement as a permanent record.	Agree. This recommendation has not yet been implemented and will require additional resources and analysis to implement. The County's Chief Information Officer will work with the Chief Executive Office to request funds to establish a County Program Management Office (CPMO) in the Fiscal Year 2016-17 Budget. The CPMO will be responsible for fostering project management best practices, which will include defining and measuring the performance and efficiencies to be achieved by information technology (IT) projects. The Chief Information Officer is replacing the Business Automation Plan with an IT Project/Application Portfolio Management tool that will be used as the repository for all IT projects, applications and measurements.
#4.2 - The Los Angeles County Chief Information Officer should require, upon the completion of software development projects above Los Angeles County Board of Supervisors' cost threshold, a measure of the success of the system (productivity metric), and the Chief Information Officer should keep this measurement as a permanent record.	Agree. This recommendation has not yet been implemented and will require additional resources and analysis to implement. The County's Chief Information Officer will work with the Chief Executive Office to fund and establish a CPMO in the Fiscal Year 2016-17 Budget. The CPMO will be responsible for fostering project management best practices, which will include defining and measuring the performance and key success factors for information technology (IT) projects. The Chief Information Officer is replacing the Business Automation Plan with an IT Project/Application Portfolio Management tool that will be used as repository for all county IT projects, applications and these measurements.
#4.3 - The Los Angeles County Chief Information Officer should establish a	Agree. Currently, the Sr. Associate CIOs within the Office of the CIO currently



centralized quality control group to monitor the progress and problems of system development projects.	provides oversight for key IT projects within their assigned departments. The Chief Information Officer will work with the Chief Executive Office to request funds to establish a CPMO in the Fiscal Year 2016-17 Budget, which will define comprehensive measures for project progress oversight of IT projects.
#4.4 - The Los Angeles County Chief Information Officer should provide a system development guideline. While not meant to constrain the development approach, the guideline should standardize the steps and deliverables at the end of each step of the system development process.	Agree. This recommendation has not yet been implemented and will require additional resources and analysis. The County's Chief Information Officer will work with the Chief Executive Office to request funds to establish a CPMO in the Fiscal Year 2016-17 Budget. The CPMO will develop recommended IT project management processes, guides, templates, and tools.
#4.5 - The Los Angeles County Chief Information Officer should provide a project management guideline or standard so that anyone can look at the project plan and see whether the project is on schedule or behind schedule.	Agree. This recommendation has not yet been implemented and will require additional resources and analysis. The County's Chief Information Officer will work with the Chief Executive Office to request funds to establish a CPMO in the Fiscal Year 2016-17 Budget. The CPMO will develop IT project management guidelines and standards. Additionally, an upgraded IT Project/Application Portfolio Management tool will be used as a repository for selected IT projects and will list project milestones and schedules.
#4.6 - The Los Angeles County Chief Information Officer should provide training in its guidelines and standards.	Agree. This recommendation has not yet been implemented and will require additional resources for implementation. The County's Chief Information Officer will work with the Chief Executive Office to request funds to establish a CPMO in the Fiscal Year 2016-17 Budget. This proposed CPMO will provide training to departments on recommended IT project management processes and guideline.
#4.7 - The Los Angeles County Chief Information Officer should continue to promulgate security standards.	Agree. This recommendation has been implemented. An Information Security Program and designated a Chief Information Security Officer (CISO) has been created to lead and coordinate the County's information security efforts across departments. The CISO collaborates with an Information Security Steering Committee comprised of departmental information security officers to develop, issue and update information security standards.
#4.10 - The chief data officer of the Los Angeles County Chief Information Officer should continue to standardize county data.	Agree. This recommendation has been implemented. The County has adopted County Policy 6.200 Information Sharing and Management Policy and has designated a Chief Data Officer to lead a Data Governance Council to coordinate the County's information management and sharing efforts across departments, including improving data quality, data management, and standardization of County data.
#4.13 - The Los Angeles County Chief Information Officer should provide programming standards for each programming language used within Los Angeles County.	Agree. This recommendation has not yet been implemented and will require additional resources and analysis to implement. The County's Chief Information Officer will work with the Chief Executive Office to request funds to establish an Enterprise Architect in the Fiscal Year 2016-17 Budget. The Enterprise Architect will be responsible for developing and promoting the use of common technology platforms and standards, including those for software development.

#4.14 - The Los Angeles County Chief Information Officer should provide a guideline on the selection of a programming language for the development of new systems.	Agree. This recommendation has not yet been implemented and will require additional resources and analysis to implement. The County's Chief Information Officer will work with the Chief Executive Office to request funds to establish an Enterprise Architect in the Fiscal Year 2016-17 Budget. The Enterprise Architect will be responsible developing and promoting the use of common technology platforms and standards, including those for software development.
#4.15 - The Los Angeles County Chief Information Officer should recommend that departments with COBOL-based systems but insufficient numbers of COBOL programmers should consider using Information Technology Service support.	Agree. This recommendation has been implemented. All mainframe-based COBOL applications are currently being maintained by Information Technology Services of the Internal Services Department.
4.16 - The Los Angeles County Chief Information Officer should provide in-house training and formal classes as needed.	Agree. This recommendation has not yet been implemented and will require additional resources and analysis. The County's Chief Information Officer will work with the Chief Executive Office to fund and establish a CPMO in the Fiscal Year 2016-17 Budget. The CPMO will be responsible for fostering project management best practices which will include training, as appropriate.
#4.18 - The Los Angeles County Chief Information Officer should require a cost-benefit analysis to be provided by the department to the Los Angeles County Chief Information Officer to assess whether it is better to upgrade the existing system or acquire a new system.	Agree. This recommendation has not yet been implemented and will require additional resources and analysis to implement. The County's Chief Information Officer will work with the Chief Executive Office to request funds to establish a CPMO in the Fiscal Year 2016-17 Budget. This proposed CPMO will develop a recommended Business Case proposal that will require comparison of solution alternatives and provide a basis for selecting the one that delivers greatest value.
<b>Community Development Commission – Affordable Housing</b>	
<b>Recommendation</b>	<b>Response</b>
#1.1 - The Los Angeles County Community Development Commission should review the recommendations made in the 2012 Affordable Housing and Economic Development Framework and Implementation Strategy regarding affordable housing funding and goals and revise accordingly, in collaboration with the Chief Executive Office, to determine current and future funding needs.	<p>The recommendation has not yet been implemented, but will be implemented in the future.</p> <p>The paths of Affordable Housing and Economic Development programs have diverged and are covered under separate initiatives. A draft Affordable Housing Development Framework, 2015 Update has been completed, and focuses only on affordable housing needs and solutions. The 2015 Framework will be submitted to the Chief Executive Office (CEO) and to the Board of Supervisors in September, 2015.</p>
#1.2 – The Community Development Commission should continue to analyze project delivery costs associated with county-funded affordable housing developments to ensure that the 20 percent administration fee is appropriate.	<p>The recommendation requires further analysis.</p> <p>The draft Affordable Housing Development Framework, 2015 Update addresses this issue. Once the CEO and Board have an opportunity to review the 2015 Framework this Fall, it is anticipated that administrative fees will be a topic for discussion.</p>
#1.3 - The Community Development Commission should determine how	The recommendation has not yet been implemented, but will be implemented

staffing levels would need to be adjusted, including whether consultants may be needed, to release Notices of Funding Availability of a higher value, should the Board of Supervisors decide to request the county funds be allocated to projects more expeditiously.	<p>in the future.</p> <p>The CDC's decision to adjust staffing levels and/or employ consultant services will depend on forecasting needs and estimating workloads. Again, the draft Affordable Housing Development Framework, 2015 Update speaks to this issue. The estimated timeframe for increasing staffing levels, if any, will be four months in advance of any funding-enhanced NOFA.</p>
#1.4 - The Community Development Commission should revise the project summary reports produced in Tracker to show additional data fields, including original and actual completion dates, budgeted and actual county and other funding source expenditures to date, and number of affordable and special needs units in each project.	<p>The recommendation requires further analysis.</p> <p>We have been reviewing the limitations of the existing Tracker system to accept additional fields. However, this type of information is available upon request and the CDC has provided it accordingly to the CEO and the Board offices. The Funding Agreements that authorize the transfer of funds from the County to the CDC only require an annual fiscal year-end report. It should be noted that the CDC is in the process of procuring for a software consultant to assess the Tracker system.</p>
#1.5 - The Community Development Commission should submit Notices of Funding Availability that include county funds to the Board of Supervisors for review prior to release.	<p>The recommendation will not be implemented because it is not warranted.</p> <p>The monthly meetings with the deputies from all five Board Offices offers the CDC with opportunities to provide information and answer inquiries about the criteria and funding levels proposed for NOFAs, and to receive to any comments back from the Board Offices prior to NOFA issuance.</p>
#1.6 - The Community Development Commission should present to the Board of Supervisors more comprehensive monthly reports of all county funded affordable housing projects.	<p>The recommendation requires further analysis.</p> <p>The Board offices receive the Tracker Reports on a monthly basis. As noted in our response to Recommendation 1.4 above, we are exploring the ability of the existing Tracker system to accept additional data. However, this type of information is available upon request and the CDC has provided it accordingly to the CEO and the Board offices. The CDC will expeditiously comply with Board of Supervisors' requests for more comprehensive monthly reports of all County-funded affordable housing projects.</p>
<b>Executive Board of the Office – Sybil Brand Commission for Institutional Inspections</b>	
<b>Recommendation</b>	<b>Response</b>
#10.2 - The Sybil Brand Commission for Institutional Inspections should conduct additional and more-comprehensive jail inmate and staff interviews, which the SBC can accomplish by reducing the number of its meetings.	<p>The SBC agrees with this finding and recommendation of 10.2. The SBC plans to reduce the number of weekly meetings to twice a month. During the weeks when there are no SBC meetings, the Commission will spend its time conducting commission business and inspections, which includes additional and more comprehensive jail inmate and staff interviews. Additionally, SBC is reviewing their processes for the inspection of jail facilities, including meetings with the Sheriff and Probation Departments to enhance protocols to maximize</p>

	inspections in a more efficient manner.
<b>Internal Services Department – Information Technology Service</b>	
<b>Recommendation</b>	<b>Response</b>
#4.11 – Information Technology Service should establish a council to set priorities for requests for service by Information Technology Service and discuss customer problems.	ISD agrees with the recommendation. The County CIO Council is the current forum for information technology discussions and will include a customer Steering Committee focused on service delivery by the ISD/Information Technology Service for new County Data Center. The governance charter for the Steering Committee will be developed in Fiscal Year 2015-16.
#4.12 – Information Technology Service should institute written service-level agreements between clients and Information Technology Service.	ISD agrees with the recommendation. ISD has a number of targeted service-level agreements with client departments in place today. The ISD Information Technology Service will comprehensively expand the number of service related-level agreement to fully cover the ISD/ITS Service Catalog with the next updates.
<b>Probation – Detention Juvenile Facilities</b>	
<b>Recommendation</b>	<b>Response</b>
#14.7 - The Los Angeles County Probation Department (Probation) should repair/upgrade the Inglewood Juvenile Courthouse Jail. In addition, Probation should ensure the facility passes annual health inspections without any issues. Probation should install a refrigerator instead of using a portable cooler for storing food for juveniles. Probation should streamline the 911 emergency call processes at this facility.	The Probation Department works with the Department of Public Health and our partners, the Department of Health Services' Juvenile Court Health Services and the Department of Mental Health, on facility health inspections to correct deficiencies identified during such inspections. Minor maintenance and facility issues are addressed by the Department; however, structural and major repairs are reported to the Superior Court for repair. Additionally, the Probation Department has access to refrigerators in the youth holding area. Coolers are utilized to transport the food from the facility to court at which time, food is transferred from the cooler to the refrigerators. Management will issue a reminder to staff that food is to be placed in the refrigerator once youth arrive at court. Lastly, the Department currently has a robust 911 emergency protocol; management will review and reissue the applicable policy to staff.
#14.9 - Probation should resolve staffing-level issues at its camps and properly maintain first aid kits there.	The Probation Department agrees with this recommendation. The Department has already increased the number of staff assigned to all of the Camps, which has resulted in a higher, day-to-day, staff-to-youth ratio. The enhanced staffing ratios were implemented to ensure the effective service delivery and supervision for detained youth. The enriched staffing ratios have remained in place and have resulted in improved outcomes for youth. Staffing ratios were approved under the Department of Justice Settlement Agreement, effective November 1, 2013. Additionally, the Department has ensured that all first aid kits are fully stocked.
<b>Sheriff – Detention</b>	
<b>Recommendation</b>	<b>Response</b>
#14.4 - The Los Angeles County Sheriff's Department (LASD) should communicate with the Judicial Council of California about the Bellflower	The Department concurs with each of the four recommendations.

<p>Courthouse Jail building to resolve safety issues due to radio dead zones and to repair the alarm systems for exit doors. LASD should also upgrade the gun lock-up and ensure the temperature on the refrigerator meets the food safety standard.</p>	<p>Experts from the Department's Sheriff's Communication Center (SCC) assessed the situation and found the dead zones to be in the stairwell areas, which have reinforced steel and dense concrete walls. While it would be optimal to have radios work flawlessly in these areas, full correction would require the construction of a new courthouse or the application of a technological solution that does not yet exist. Given this background, this issue will be raised with the Judicial Counsel of California (JCC) when the construction of new courthouse buildings is considered. The Department recognizes the availability of a new courthouse will be many years away, accordingly, the Department's SCC staff has since reviewed and adjusted the repeater dish to maximize the receptivity and broadcasting ability of the current radios.</p> <p>In regard to the other issues, the exit-door alarms have been repaired. The Department is working through the Department's Facilities Services Bureau's (FSB) Sheet Metal Unit, to see if new gun lockers can be modified or newly constructed. A service request has been placed with FSB to have the refrigerator repaired to reduce the temperature from 45 degrees to the desired 41 degree level.</p>
<p>#14.5 - LASD should communicate with the Judicial Counsel of California (JCC) about repairing the Compton Courthouse holding area. LASD should ensure food for inmates is refrigerated properly.</p>	<p>The Department concurs with the Civil Grand Jury's recommendations as they relate to facility repair issues at the County's Compton Courthouse. The Department disagrees with the Civil Grand Jury's recommendations as they relate to the issue of inmate food refrigeration. The Department's Food Services Unit confirmed the lunches sent to Compton Court are those that do not require refrigeration.</p> <p>As a result of the Civil Grand Jury's recommendations, repair requests have been submitted to America Building Maintenance (ABM) to address the specific areas of repair noted in the Civil Grand Jury's report (e.g. scratches to the walls and ceilings, general low water pressure in the lockup, painting, etc.).</p>
<p>#14.6 - LASD should remove graffiti in the cells at East Los Angeles Courthouse Jail and should ensure the turn-out gear fits the deputies working at this facility</p>	<p>The Department concurs with the Civil Grand Jury's recommendations, and a request has been made with ABM to remove the graffiti.</p> <p>New turnout gear was acquired to accommodate the assigned staff. Fire drill training has been conducted to ensure staff familiarity with the equipment</p>
<p>#14.8 - The LASD should promptly resolve the ongoing plumbing and pest issues in the Men's Central Jail building without waiting to address the larger issue of overcrowding.</p>	<p>The Department concurs and fully supports this recommendation, and will continue to repair plumbing systems and address pest issues through routine and emergent maintenance.</p> <p>The Department continually and consistently repairs and replaces aging</p>

	<p>plumbing systems and fixtures throughout the Department's Men's Central Jail (MCJ). The Department contracts for pest control services and ensures consistent abatement efforts are ongoing. While committed to resolving these problems, permanent solutions are difficult due to the aging facility.</p> <p>There is currently an effort to replace the Department's MCJ with a correctional treatment facility, which is one of the long term solutions. To address the challenge of overcrowding, a comprehensive review of the Department's current and future inmate housing needs is underway. In addition to the evaluation of capacity needs, the County is collaborating with non-profit organizations and community leaders exploring opportunities to reduce overcrowding through diversion, alternative custody options, recidivism reduction, and enhanced credit earning strategies. These efforts are ongoing.</p>
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